

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Cases
	:
LEHMAN BROTHERS HOLDINGS INC. <u>et al.</u> ,	: 08-13555 (JMP)
	:
Debtors.	: Jointly Administered
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**ORDER REQUIRING LEHMAN BROTHERS HOLDINGS INC.
TO PROVIDE REQUESTED INFORMATION AND TO DEEM
CLAIM TO BE TIMELY FILED BY THE SECURITIES PROGRAM BAR DATE**

Upon consideration of the motion (the "Motion") of Banesco Banco Universal ("Banesco") for entry of an order (the "Order") pursuant to 11 U.S.C. §105 of the United States Bankruptcy Code (the "Bankruptcy Code") and Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") requiring Lehman Brothers Holdings Inc. ("LBHI") to provide to Banesco the Identification Number¹ of the Note and, in the alternative, either adding the Note to the Program Securities List or deeming that any proof of claim filed by Banesco in respect of the Note shall be filed timely; and for such further relief as the Court may deem just and proper; and it appearing that the relief requested by the Motion is appropriate; and due notice of the Motion having been given; and it appearing that no other or further notice need be given; and the Court having found and determined that it should exercise its discretion to grant the relief requested in the Motion and that the legal and factual bases set forth in the

¹ Capitalized terms used but not otherwise defined herein have the respective definitions ascribed to such terms in the Motion.

Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that, pursuant to 11 U.S.C. §105 of the Bankruptcy Code and Rule 9006(b)(1), the Motion is granted;

ORDERED that LBHI shall immediately provide the Identification Number of the Note to Banesco;

ORDERED that, should the Identification Number not be listed on the Program Securities List, the Identification Number shall be deemed added to the Program Securities List and any proof of claim relating to the Note shall be deemed timely filed in all respects and without prejudice to the rights of Banesco, so long as the proof of claim is filed by November 2, 2009; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: New York, New York
_____, 2009

HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE